

HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JOHN DOE,

Plaintiff,

v.

AMHERST COLLEGE, CAROLYN  
MARTIN, JAMES LARIMORE, TORIN  
MOORE, SUSIE MITTON SHANNON, an  
LAURIE FRANKL,

Defendants.

Case No.: 16-mc-00128-RSL

DECLARATION OF MEGAN C.  
DELUHERY IN SUPPORT OF  
PLAINTIFF'S OPPOSITION TO  
MOTION TO QUASH SUBPOENA

I, Megan C. Deluhery, am over the age of 18, have personal knowledge of all the facts  
stated herein and declare as follows:

1. I am a partner at Todd & Weld LLP, counsel for the Plaintiff in the underlying  
matter pending in the U.S. District Court for the District of Massachusetts (Civil Action No.  
3:15-cv-30097 (the "Underlying Action")). My application to appear *pro hac vice* before this  
Court will be submitted as soon as the above miscellaneous action converted to a civil action.

2. Attached hereto as Exhibit A is a true and correct copy of Plaintiff's Amended  
Complaint and Jury Demand in the Underlying Action.

3. Attached hereto as Exhibit B is a true and correct copy of Plaintiff's Opposition to  
Defendants' Motion for Judgment on the Pleadings filed in the Underlying Action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Megan C. Deluhery (BBO#655564)  
TODD & WELD LLP

Megan C. Deluhery (BBO#655564)  
TODD & WELD LLP

CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2016 I caused the foregoing and exhibits attached hereto to be electronically filed with the Clerk of the Court using the CM/ECF system and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants for the this miscellaneous action:

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/s/ Elizabeth A. Findley  
Elizabeth A. Findley (WSBA #46990)